

Deaf and Hard of Hearing Consumer Advocacy Network

3951 Pender Drive, Suite 130

Fairfax, VA 22030

February 25, 2004

VIA ELECTRONIC MAIL

Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, DC 20554

Re: NOTICE OF EX PARTE PRESENTATION
Telecommunications Relay Services and Speech-to-Speech Services for
Individuals with Hearing and Speech Disabilities, CC Docket No. 98-67

Dear Ms. Dortch:

This is to advise you that, on February 23, 2004, Cheryl Heppner, Vice Chair of the Deaf and Hard of Hearing Consumer Advocacy Network, sent the attached e-mail to Chairman Michael Powell, Commissioner Kathleen Abernathy, Commissioner Kevin Martin, Commissioner Michael Copps, Commissioner Jonathan Adelstein, and their respective staff: Bryan Tramont and Christopher Libertelli (Chairman's Office), Matthew Brill (Commissioner Abernathy's Office), Carolyn Conyers and Jessica Rosenworcel (Commissioner Copps' Office), Daniel Gonzalez (Commissioner Martin's Office), Scott Bergmann (Commissioner Adelstein's Office). This e-mail is regarding proposed Commission action on a waiver request for Video Relay Service rules regarding speed of answer.

Pursuant to the Commission's *ex parte* rules, this letter is being filed electronically in the above-referenced docket. Please direct any questions regarding this filing to the undersigned.

Respectfully submitted,

By: Cheryl A. Heppner
Cheryl Heppner
Vice Chair

Attachment

Cheryl Heppner

From: Cheryl Heppner

Sent: Monday, February 23, 2004 5:35 PM

To: 'michael.powell@fcc.gov'; 'kathleen.abernathy@fcc.gov'; 'kevin.martin@fcc.gov';
'jonathan.adelstein@fcc.gov'; 'michael.copps@fcc.gov'

Cc: 'matthew.brill@fcc.gov'; 'carolyn.conyers@fcc.gov'; 'jessica.rosenworcel@fcc.gov';
'daniel.gonzalez@fcc.gov'; 'scottbergmann@fcc.gov'; 'scott.bergmann@fcc.gov';
'bryantramont@fcc.gov'; 'bryan.tramont@fcc.gov'; 'christopher.libertelli@fcc.gov'

Subject: VRS waiver for speed of answer

Dear Chairman Powell and Commissioners Abemathy, Martin, Copps, and Adelstein,
I am the Vice Chair of the Deaf and Hard of Hearing Consumer Advocacy Network. It has come to our coalition's attention today that you will probably be making a decision early this week on one Video Relay service waiver issue. This waiver issue concerns the speed of answer that one gets when dialing for a VRS call.

The FCC currently requires that the TRS providers must answer calls within ten seconds equal to or higher than eighty five percent at all times. This requirement has been waived for Video Relay Service calls to allow for this service to evolve on an experimental basis.

However, the number of VRS calls has accumulated by leaps and bounds on a monthly basis in the last two years since this service began, and we really need to see the speed of answer be made a mandatory requirement for the VRS providers, not to be given waiver extensions anymore. We want to have the same quick access to the VRS service that we enjoy with the traditional TRS service. We seek to have functional equivalency, like those who experience regular voice phone service.

The same goes to those without hearing disabilities that need to make calls with us via VRS; they would also experience functional equivalency. They would not experience as much lag time during turns of conversation in a phone call. For example, one using voice would speak 200 words per minute and the person signing back to the agent via VRS would sign 200 words per minute. The agent would facilitate communication without any delay to either party. Functional equivalency is something we value very much, and please be assured this is not an added-on value, as some may call it, to the array of features in relay services. We respectfully ask that you grant a mandatory speed of answer requirement in the earliest time possible. We ask that we be required to experience the consequences of such a waiver for the next four years.

Thank you for giving DHHCAN's request your full, serious consideration.

Sincerely,

Cheryl Heppner

Vice Chair, Deaf and Hard of Hearing Consumer Advocacy Network

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